

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

INDICTMENT

18 U.S.C. § 1343

28 U.S.C. § 2461(c)

DENIS VLADMIROVICH MOLLA,
a/k/a Dennis Molla,

Defendant.

The UNITED STATES GRAND JURY charges that:

INTRODUCTION

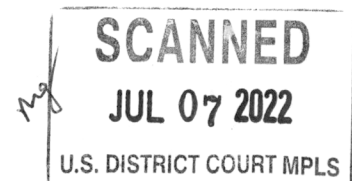
At times relevant to this Indictment:

1. From at least in or about in or about September 2020 through at least in or about July 2021, the defendant, DENIS VLADMIROVICH MOLLA, defrauded and attempted to defraud Victim Insurance Company A and individual GoFundMe donors out of more than \$300,000 based on his false claim that his garage and vehicles were burned by unknown individuals who targeted him based on his political beliefs.

The Defendant and Related Entities

2. Defendant DENIS VLADMIROVICH MOLLA was a resident of Brooklyn Center, Minnesota.

3. Victim Insurance Company A was a company based in Bloomington, Illinois, that sold home and auto insurance. Molla purchased multiple insurance policies from Victim Insurance Company A for his home and vehicles.



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4. GoFundMe was a crowdfunding web-based platform headquartered in Redwood City, California, that allowed people to raise money for other people undergoing life events such as celebrations, accidents, and injuries.

THE SCHEME TO DEFRAUD

5. From at least in or about September 2020 through at least in or about July 2021, in the State and District of Minnesota and elsewhere, the defendant,

**DENIS VLADMIROVICH MOLLA,
a/k/a Dennis Molla,**

did knowingly and intentionally devise and execute a scheme and artifice to defraud and to obtain money from Victim Insurance Company A and from GoFundMe donors by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

6. The object of the scheme to defraud was to file, or cause to be filed, one or more fraudulent insurance claims with Victim Insurance Company A seeking payment of money to MOLLA for property damage and other losses relating to a September 23, 2020 fire that MOLLA started on his own property, and thereby enrich himself.

7. It was part of the scheme to defraud that on or about September 23, 2020, MOLLA falsely reported to law enforcement that someone lit his camper on fire, that three unknown males were near his home when he heard an explosion, that his garage door was vandalized with spray painted graffiti stating “Biden 2020,” “BLM” and an Antifa symbol, and that his camper was targeted because it had a Trump 2020 flag displayed on it. In reality, as MOLLA well knew, MOLLA started

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his own property on fire, MOLLA spray painted the graffiti on his own property, and there were no unknown males near his home.

8. It was further part of the scheme to defraud that MOLLA submitted multiple insurance claims to Victim Insurance Company A seeking coverage for the damage to his garage, camper, vehicles, and residence caused by the fire. When Victim Insurance Company A denied some of those claims, MOLLA submitted written complaints to Victim Insurance Company A claiming that it was defrauding him. MOLLA also threatened to report Victim Insurance Company A to the Department of Commerce and the Attorney General.

9. It was further part of the scheme to defraud that MOLLA created and permitted other people known and unknown to the Grand Jury to create two GoFundMe accounts to benefit MOLLA and his family. MOLLA provided written comments on both GoFundMe accounts documenting the property losses that he suffered, thanking the numerous donors, and reiterating his threats to Victim Insurance Company A. MOLLA withdrew thousands of dollars donated to the two GoFundMe accounts and deposited the donated money in to his personal Wells Fargo bank account.

10. In total, as a result and in furtherance of his scheme to defraud, MOLLA made a claim for more than \$300,000, and he received approximately \$61,000 in payments from Victim Insurance Company A. In addition, MOLLA received more than \$17,000 from individual donors via GoFundMe.

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COUNTS 1-2
(Wire Fraud)

11. Paragraphs 1 through 10 are incorporated by reference as if fully set forth herein.

12. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

**DENIS VLADMIROVICH MOLLA,
a/k/a Dennis Molla,**

for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, and sounds, as described below:

Count	Date of Wire (on or about)	Interstate Wire
1	October 22, 2020	E-mail from MOLLA to Victim Insurance Company A's Adjuster entitled "Dennis Molla Arson Hate Crime September 23."
2	November 2, 2020	Deposit of \$17,135.94 from "Patriots For The Mollas" GoFundMe account to MOLLA's Wells Fargo bank account.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

13. Paragraphs 1 through 12 of the Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c).

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14. As a result of the offenses alleged in Counts 1 and 2, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

15. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON